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July 7, 2021

Honorable Colleen McMahon
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

USDC SDNY
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VIA ECF

Re: United States vs. Tatiana LaForest
CASE NO. 21-CR-272 CM

MEMO ENDORSED

Dear Judge McMahon:

As the Court is aware, I represent the above named defendant, Tatiana LaForest. At this time, we are hereby requesting a modification of her release order. I respectfully request the removal of any curfew for Tatiana LaForest. I have spoken AUSA Matthew Shahabian, as well as Pretrial Services Officer Joshua Rothman, who have no objection to the proposed modification to end the curfew restrictions. The government is still requesting that she be subjected to stand alone GPS.

Thank you for your anticipated consideration in this matter. If you have any questions please feel free to contact my office.

Yours Truly,

s/Barry Goldberg

Barry Goldberg, Esq.

SO ORDERED:

Colleen McMahon
Honorable Colleen McMahon

CC: AUSA MATTHEW SHAHABIAN,
PRETRIAL SERVICES OFFICER JOSHUA ROTHMAN

7/8/2021